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15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 MATTHEW HOGAN,
19 Plaintiff,

20 v.

21 MATTHEW J. WEYMOUTH,
22 PATRICK C. CHUNG,
23 PRO SPORTORITY (ISRAEL) LTD.,
24 KARL RASMUSSEN,
25 BEASLEY BROADCAST GROUP
26 INC., MELISSA EANNUZZO, and
27 DOES 1-10,

28 Defendants.

No. 2:19-cv-02306-MWF-AFMx

**SECOND DECLARATION OF
PATRICK CHUNG IN SUPPORT
OF MOTION TO DISMISS**

Date: October 21, 2019
Time: 10:00 a.m.
Location: Courtroom 5A
Judge: Michael W. Fitzgerald

SECOND DECLARATION OF PATRICK CHUNG

I, Patrick Chung, declare:

1. I am over the age of 18. The matters stated in this declaration are true of my own personal knowledge. If called as a witness, I could and would competently testify to these matters.

2. I am a resident of Foxborough, Massachusetts. I am a professional football player for the New England Patriots.

3. I do not own any assets in California, nor do I reside there. In 1997, when I was ten years old, I moved to California with my family and lived there until I graduated high school in 2004. I have not lived in California since that year, but I have returned to the state from time to time to visit my family.

4. Since joining the NFL in 2009, I have played a handful of football games in the state of California, but have not otherwise done business in the state.

5. On February 6, 2019, while in Massachusetts, I posted screenshots of text messages between Matthew Hogan and Matthew Weymouth to the internet, along with a comment that I wrote to accompany them.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on this 18 day of September, 2019, in Foxborough, Massachusetts.



Patrick Chung